

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
FLORIDA, FORT LAUDERDALE DIVISION

SAINTIL SAINTILUS

Plaintiff

v.

Case No. 006016 CIV Ungaro-Benages
Magistrate Judge: Brown

NAMASCO CORPORATION
and NAMASCO CORPORATION
d/b/a NAMASCO STEEL
COMPANY

Defendant.

FILED
JAN 24 PM 3:57
CLERK OF U.S. DISTRICT CT.
S.D. OF FLA - MIA
D.C.

**PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION TO DISMISS
PLAINTIFF'S COMPLAINT AND MOTION TO AMEND COMPLAINT**

The Plaintiff, SAINTIL SAINTILUS (hereinafter SAINTILUS), by and through his undersigned attorneys, hereby responds to Defendant, NAMASCO CORPORATION and NAMASCO CORPORATION d/b/a NAMASCO STEEL COMPANY's (hereinafter NAMASCO) Motion to Dismiss and files his Motion to Amend Complaint and states as follows:

1. Plaintiff is in agreement that the complaint should be amended to remove claims of race discrimination. Defendant does not have an objection to Plaintiff filing an Amended Complaint.
2. Plaintiff has attached his proposed Amended Complaint hereto. The Amended Complaint eliminates Plaintiff's complaint for race discrimination and clarifies the charges.
3. F.R.C.P. 15A state that a party may amend a party's pleading by leave of court.

"Leave shall be freely given when justice so requires. ID.

[Handwritten signature]

WHEREFORE, Plaintiff, SAINTIL SAINTILUS, respectfully requests this honorable court enter an order allowing Plaintiff to amend his complaint and deem the Amended Complaint filed as of the date of the order.

Respectfully submitted this 20th day of January, 2000

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed on this 20th day of January, 2000 to John T. Kolinski, Esquire, 201 South Biscayne Boulevard, Suite 1500, Miami, Florida 33131.

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By: 

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